

ITEM 5



DEPARTMENT OF THE NAVY
 COMMANDER NAVY REGION SOUTHWEST
 837 NO. HARBOR DR.
 SAN DIEGO, CALIFORNIA 92132-0086

IN REPLY REFER TO: *a RB action to*
 5090 *amend the permit*
 Ser N45JWB.RC/0313
 August 31, 2004

Mr. John Robertus
 Executive Officer
 California Regional Water Quality Control Board
 San Diego Region
 9174 Sky Park Court, Suite 100
 San Diego, CA 92123

Dear Mr. Robertus:

Naval Base San Diego (NBSD) NPDES Permit No. CA0109169 requires for High Risk areas, diversion of the first $\frac{1}{4}$ inch of storm water runoff from each rain event. One of the High Risk locations identified at NBSD is the scrap metal recycling yard. Measures are currently in place to contain the runoff for the scrap metal yard.

Our office has been working with Navy Facilities Engineering Service Center (NFESC) on storm water runoff treatment technology. To date we have conducted lab testing of various filtration/adsorption media, selected the filtration/adsorption media with best lab performance, run lab testing on actual runoff collected from the scrap metal yard, and conducted in-situ testing of a small scale filtration/adsorption unit at the scrap yard during rain events. We will be installing a 1/20th scale model of a storm water adsorption model the week of September 7 for additional performance testing. This will be the final testing before the full-scale operational model is installed, currently slated for a start date of 15 September 2004.

Initial test results indicate that this adsorption treatment process will pass Acute Toxicity test requirements of 90% survival 50% of the time and not less than 70% survival 10% of the time. This adsorption process and test results have been discussed with Mr. Paul Richter and Mr. John Phillips from your staff along with copies of the treatment test results.

We are requesting the NBSD NPDES Permit High Risk definition be modified to add the statement, "For the NAVSTA facility, the discharge of the first $\frac{1}{4}$ inch of storm water runoff from all High-risk areas shall be terminated no later than 2 years after the adoption of this Order or equivalent technology applied to the discharge." This will allow for small scale testing of the treatment system described above. If it is found that the treatment system does not meet Acute Toxicity test requirements the scrap metal yard runoff discharge will cease and the $\frac{1}{4}$ inch high-risk diversion requirements will be adhered to.

JS 9-9-04

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STANDARD
 WATER QUALITY
 CONTROL BOARD

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5090

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If there are any questions regarding this submittal, please contact me at (619) 524-6417.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert A. Chichester". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

ROBERT A. CHICHESTER
Water Program Manager

By direction of the Commander